



State Water Resources Control Board  
**NOTICE OF INTENT**

GENERAL PERMIT TO DISCHARGE STORM WATER  
ASSOCIATED WITH INDUSTRIAL ACTIVITIES (WQ ORDER No. 2014-0057-DWQ)  
(Excluding Construction Activities)



EDMUND G. BROWN JR.  
GOVERNOR

MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

WDID: 4 19I023146

Status: Active

**Operator Information**

Type: Private Business

Name: Environ Strategy Consultants

Contact Name: Ryan Bonner

Address: 1036 W Taft Ave

Title: President

Address 2:

Phone #: 714-919-6500

City/State/Zip: Orange CA 92865

Email: rbonner@es-online.com

Federal Tax ID:

**Facility Information**

Level:

Site Name: Avalon WWTP

Contact Name: Van Madding

Address: 123 Pebbly Beach Rd

Title:

City/State/Zip: Avalon CA 92618

Site Phone #: 310-510-0731

County: Los Angeles

Email: vmadding@es-online.com

Latitude: 33.3432

Longitude: -118.32336

Emergency: 310-909-4294

Total Site Size: 2.6 Acres

Percent of Site Impervious (including rooftops): 84.6 %

Industrial Area exposed to Storm Water: 2.2 Acres

**SIC Code(s)**

Primary SIC: 4952

Sewerage Systems

Secondary SIC:

Tertiary SIC:

**Additional Information**

Receiving Water: Pacific Ocean

Water Flow: Indirectly

Storm drain system: City of Avalon

Compliance Group:

RWQCB Jurisdiction: Region 4 - Los Angeles

Phone: 213-576-6600

Email: r4\_stormwater@waterboards.ca.gov

**Certification**

Name Van Madding

Date: June 23, 2015

Title: Plant Manager

**Attachments Meta Data Information:**

Attachment ID	File Name	File Description	File Hash	File Size	Date Attached	Attachment Type
1117887	SWPPP.003	Laboratory Results with Chain of Custody forms		8424847	2012-06-29 13:21:26.0	Laboratory Results
1117872	SWPPP.002	Discharge Observation Forms (Quarterly and Monthly Wet Season)		13863199	2012-06-29 13:17:49.0	Supporting Documentation
1117868	SWPPP.001	Annual Facility Inspection with corresponding work orders		2872798	2012-06-29 13:12:07.0	Supporting Documentation
1128878	NNC 08-10-2012			1989931	2012-08-17 08:21:50.0	Enforcement Document
1283889	2013-14 AR rcvd via email on 6-29-2014 Report		3b66a8a8215295ec52791b573584ad1a5d1ef9a061a13dea06974ea72a3d762	4008296	2014-07-02 17:03:57.0	E-mail Correspondence
1283890				242104	2014-07-02 16:59:28.0	Submitted Report PDF
1283888	2013-14 AR rcvd via email on 6-29-2014 Email		b372b2aae8caae512d8b7f49889224cd9927e656f2218a9a54712e514c7	5140269	2014-07-02 17:03:42.0	E-mail Correspondence
1283891	COR zip		7cb4882a5390b83081f07623f2e80dff9a46aafea2e1e893bbae88632fc927	9274748	2014-07-02 16:59:30.0	Report COR

## 1.0 INTRODUCTION

On October 5, 2018, ES Engineering Services, LLC (ES) and the City of Avalon received the email regarding the incomplete Report of Waste Discharge (ROWD) attached as Attachment 1. ES has compiled the requested information and are pleased to submit the updated ROWD on behalf of the City of Avalon.

ES has operated the City of Avalon Wastewater Treatment Facility (Avalon WWTF) since 2011. Since the last ROWD submitted in 2012, standard maintenance and operations procedures have been conducted, without major changes to the treatment system.

## 2.0 LIST OF ADDITIONAL INFORMATION

### 2.1 Update the process flow diagram to include the average flow rates through each unit process.

This is difficult to provide, since there are no meters between the individual units. Also, many units have multiple inputs and outputs. An average will also be difficult to describe, since there are seasonal and hourly variations of influent loading to the WWTF. For example, there is a heavier loading during the summer due to the tourist season, and the loading tends to be heavier in the morning and in the evenings than during the rest of the day.

The following table (Table 1) describes the original design capacities of the units in millions of gallons per day (MGD), but this does not take into account the various input and output units.

**Table 1: Original Design Capacities**

Units	Design Capacity (MGD)
Influent pumps	3.024
Aeration Basins	0.518
Secondary Clarifiers	0.587
Return Activated Sludge Pumps	1.498
Waste Activated Sludge	0.576
Chlorine Contact Tank	0.504
Aerobic Digester	0.008
Decant Tank	0.066

### 2.2 The site plan and the narrative of the treatment process submitted indicate that a trickling filter is part of the treatment process in the summer, but it is unclear where the trickling filter is in the process flow diagram. Please update the process flow diagram to include the trickling filter.

The updated process flow diagram is attached as Attachment 2.

### 2.3 The process flow diagram includes an aerated grit unit and gravity thickener, but it is unclear where these unit processes are located on the site plan. Please include a label for the aerated grit unit and gravity thickener on the site plan.

The updated site plan is attached as Attachment 3.

### 2.4 The SWPPP indicated polymer is added to at the centrifuge but this is not reflected in the process flow diagram. Please update the process flow diagram to include polymer injection at the centrifuge.

The updated process flow diagram is attached as Attachment 2.

**2.5 It is unclear how the certification supplement submitted is related to the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems (Order No. 2006-0003-DWQ). Please indicate the document from which this certification statement was obtained.**

The certification statement was found in our electronic records unattached to a document. We have reviewed all of our electronic records (which start around 2007) and have not found the original NOI for Order No. 2006-0003-DWQ. However, we assert that the original NOI was most likely filed by United Water Services, the operator of the Avalon WWTF at the time, since the Avalon WWTF has operated under the following WDRs: 79-137, 85-052, 94-069, R4-2002-0094, R4-2008-0028, as well as the active R4-2013-0182.

We understand that a request was sent to the SWRCB regarding an attempt to locate the document, but since this is from before electronic recordkeeping was initiated, it is unlikely to be found through that route. An attempt to locate the NOI has also been initiated with the City of Avalon as well. However, as of the date of this reply, the original NOI document has not been located.

Please advise on how we should proceed in regard to the NOI for Order No. 2006-003-DWQ.

**2.6 Update EPA Form 2A.**

Form 2A is provided as Attachment 4. The following are responses to the individual items listed on the Incomplete ROWD Notification.

- a. A.11.c. Indicate the method used to disinfect the effluent.

Form 2A has been updated to show that a 12% chlorine solution is injected at the entry of the Chlorine Contact Chamber on a continuous feed basis.

- b. B.1. The inflow/infiltration flow rate is almost the same as the flow treated at the facility. Please review the flow rate, revise the reported value if needed, and explain any steps underway or planned to minimize inflow and infiltration.

The inflow and infiltration estimate provided in the 2012 ROWD was 151,000 gpd. The change in population in the city and the annual average daily flow rates have had negligible changes since 2012. A rehabilitation process to the sewage collection system has been ongoing, refurbishing approximately 15% of the sewage system in the City of Avalon. Therefore, an adjustment to the estimated 151,000 gpd has been made to estimate that the current inflow and infiltration rate has been calculated to be approximately 128,000 gpd. The refurbishing of the sewage system is expected to continue and ongoing standard maintenance activities will be performed as needed.

The corrected inflow/infiltration rate has been updated with a brief description of the ongoing activities on the attached EPA Form 2A.

- c. Section B.5. Indicate whether there are planned improvements to the treatment plant during the next permit cycle that may impact the effluent quality and provide a narrative of each project including the projected effect it will have on effluent quality.

There are no planned improvements to the Avalon WWTF at this time. A tertiary sand filter implementation has been considered for water reuse. If implemented, this could allow the City of Avalon to redirect treated water to the salt water system in an attempt to decrease the corrosivity of the salt water system. ES is unaware of any final decisions regarding the implementation of the tertiary sand filter at this time.

**2.7 Please submit coordinates for all monitoring locations including receiving water and sediment monitoring locations in decimal notation.**

The following table (Table 2) provides the coordinates for all monitoring locations. The receiving water locations are denoted as RSW-001 through RSW-006 and the sediment monitoring locations are denoted as BOT-001 through BOT-006. These coordinates are approximate.

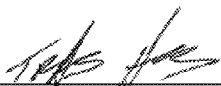
**Table 2: Monitoring Locations**

Monitoring Locations	Latitude (deg N)	Longitude (deg W)
RSW-001	33.3437	118.3169
RSW-002	33.3386	118.3111
RSW-003	33.3369	118.3105
RSW-004	33.3339	118.3096
RSW-005	33.3320	118.3072
RSW-006	33.3413	118.3140
BOT-001	33.3386	118.3111
BOT-002	33.3387	118.3112
BOT-003	33.3385	118.3110
BOT-004	33.3384	118.3109
BOT-005	33.3365	118.3092
BOT-006	33.3408	118.3127

**3.0 LIMITATIONS**

This report may be used only by the City of Avalon and the Los Angeles Regional Water Quality Control Board, and only for the purposes stated, within a reasonable time from its issuance. Land use, site conditions (both on- and off-site- or other factors may change over time, and additional work may be required with the passage of time. Any party other than the City of Avalon who wishes to use this report shall notify ES Engineering Services, LLC of such intended use. Non-compliance with any of these requirements by the client or anyone else will release ES Engineering Services, LLC from any liability resulting from the use of this report by any unauthorized party.

ES appreciates the opportunity to provide this additional information to complete the ROWD for the City of Avalon. If you have any questions, please contact Travis Hicks at (714) 919-6518.

  
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Travis Hicks, EIT, QISP  
Project Engineer

  
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